

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
LOS ANGELES
BOSTON
HOUSTON
DALLAS
AUSTIN
HANOI



FIRM and AFFILIATE OFFICES

CHRISTOPHER W. HEALY DIRECT DIAL: +1 212 692 1046 PERSONAL FAX: +1 212 409 8243 E-MAIL: CWHealy@duanemorris.com

www.duanemorris.com

SHANGHAI
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
BOCA RATON
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR

ALLIANCES IN MEXICO AND SRI LANKA

MEMO ENDORSED, page 2

June 21, 2022

HO CHI MINH CITY

VIA ECF

Hon. Edgardo Ramos U.S. District Court for the Southern District of New York 40 Foley Square New York, New York 10007

Re: Olive Group North America LLC, et al. v. Afghanistan International Bank,

No. 1:21-cv-10836-ER

Dear Judge Ramos:

Defendant Afghanistan International Bank writes pursuant to Your Honor's Individual Practice Rule 1(E) to request that the Court grant a further extension, until June 30, 2022, for Defendant to file its motion requesting attorneys' fees (the "Motion").

This is the second request for an extension in connection with this Motion. On June 3, 2022, Defendant requested an extension from June 9, 2022 to June 23, 2022 to file the Motion. (ECF No. 48.) This Court granted that extension and extended Plaintiffs' time to oppose the Motion through July 14, 2022, and Defendant's time to reply through July 22, 2022. (ECF No. 49.)

Since the Court granted the prior extension, the parties have engaged in a series of meet and confer discussions in an attempt to resolve the dispute regarding attorneys' fees. As part of this process, Defendant has provided Plaintiffs' counsel with redacted invoices, and Plaintiffs are currently reviewing these invoices and responding to Defendant's supplemental request for information regarding the requested substitution. Despite the progress made to date, the parties require an additional seven (7) days to continue their good faith negotiations.

If the Court approves this request, the new deadline for Defendant to file the Motion will be June 30, 2022, Plaintiffs' response will be due on or before July 7, 2022, and Defendant's reply will be due on or before July 14, 2022.

Duane Morris

Hon. Edgardo Ramos June 21, 2022 Page 2

Plaintiffs do not oppose this request.

Respectfully submitted,

/s/ Christopher W. Healy Christopher W. Healy

CWH

The defendant's request for a seven-day extension of time to file its motion for attorneys' fees is GRANTED as follows: moving papers due June 30, 2022; response due July 14, 2022; and reply due July 22, 2022. It is SO ORDERED.

Edgardo Ramos, U.S.D.J Dated: June 21, 2022 New York, New York